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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JIMMY WASHINGTON JR.,

Defendant.

Case No. 2:18-cr-00384-APG-EJY

STIPULATION TO CONTINUE THE
DEADLINE FOR RESPONSE AND
REPLY TO DEFENDANT JIMMY
WASHINGTON JR.'S MOTION TO
SEVER
(SECOND REQUEST)

IT IS HEREBY STIPULATED AND AGREED, by and between NICHOLAS A. TRUTANICH, United States Attorney, and CHRISTOPHER BURTON and BIANCA R. PUCCI, Assistant United States Attorneys, counsel for the United States of America, and Assistant Federal Public Defenders KATHRYN NEWMAN and RAQUEL LAZO, counsel for defendant JIMMY WASHINGTON JR., that the Response to the Motion to Sever deadline currently set for September 24, 2020, be continued and reset to October 29, 2020; and that the Reply to the Motion to Sever deadline be set to November 5, 2020.

This stipulation is entered into for the following reasons:

1. In determining its response to the defendant's motion to sever, the government filed a motion in limine concerning the admissibility of certain evidence before taking a position

1 on the motion to sever. Defendant filed a response and the motion is currently pending a decision
2 by the Court.

3 2. Once the motion in limine is decided, the government will be able to take a position
4 on the motion to sever.

5 3. The government contacted defense counsel and they agreed to the continuance.

6 4. The defendant is currently detained pending trial but does not object to a
7 continuance.

8 5. The additional time requested herein is not sought for purposes of delay, but to
9 allow the government the opportunity to resolve necessary issues in order to take an informed
10 position on the motion to sever.

11 6. This is the second stipulation to continue the response and reply deadlines filed
12 herein.

13 DATED this 24th day of September, 2020.

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15 Respectfully submitted,

16 NICHOLAS A. TRUTANICH
United States Attorney

17
18 //s//
KATHRYN NEWMAN
19 RAQUEL LAZO
Counsel for Defendant
20 JIMMY WASHINGTON JR.

21
22 //s//
CHRISTOPHER BURTON
23 BIANCA R. PUCCI
24 Assistant United States Attorneys

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

2:18-cr-00384-APG-EJY

Plaintiff,

vs.

ORDER

JIMMY WASHINGTON JR.,

Defendant.

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. In determining its response to the defendant's motion to sever, the government filed a motion in limine concerning the admissibility of certain evidence before taking a position on the motion to sever. Defendant filed a response and the motion is currently pending a decision by the Court.

2. Once the motion in limine is decided, the government will be able to take a position on the motion to sever.

3. The government contacted defense counsel and they agreed to the continuance.

4. The defendant is currently detained pending trial but does not object to a continuance.

5. The additional time requested herein is not sought for purposes of delay, but to allow the government the opportunity to resolve necessary issues in order to take an informed position on the motion to sever.

6. This is the second stipulation to continue the response and reply deadlines filed herein.

1 THEREFORE, good cause appearing, it is ORDERED that that the Response to the
2 Motion to Sever is vacated and reset to October 29, 2020; and that the Reply to the Motion to
3 Server deadline is set to November 5, 2020.

4 DATED 25th day of September, 2020.

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7 UNITED STATES MAGISTRATE JUDGE
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